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March 11, 2025


**VIA ECF**

Hon. Jennifer L. Rochon  
Daniel Patrick Moynihan  
United States Courthouse  
500 Pearl St.  
New York, NY 10007-1312

Class Plaintiffs' request for an extension is GRANTED and the proposed briefing schedule is adopted. Class Plaintiffs' Fourth Amended Complaint shall be due April 24, 2025. Defendants' motions to dismiss shall be due June 30, 2025; Class Plaintiffs' opposition briefs will be due August 14, 2025; and Defendants' reply briefs shall be due September 17, 2025.

**SO ORDERED.**

Dated: March 12, 2025  
New York, New York

  
**JENNIFER L. ROCHON**  
United States District Judge

Re: *In re: Lottery.com, Inc. Sec. Litig.*, 1:22-cv-07111-JLR (S.D.N.Y.)

Dear Judge Rochon:

We write jointly on behalf of Lead Plaintiffs RTD Bros LLC, Todd Benn, Tom Benn, and Tomasz Rzedzian ("Class Plaintiffs") and Defendants Lottery.com, Inc., Lawrence Anthony DiMatteo III, Ryan Dickinson, Matthew Clemenson, and Vadim Komissarov (collectively, "Defendants," and with Class Plaintiffs, the "Parties") to request: (i) an extension of time for Class Plaintiffs' forthcoming amended complaint; and (ii) a briefing schedule for Defendants' motion(s) to dismiss thereto.

On February 25, 2025, the Court granted-in-part and denied-in-part Defendants' motions to dismiss Class Plaintiffs' Third Amended Complaint. ECF 223. The Court granted Class Plaintiffs leave to amend within 21 days of the Order, *i.e.*, March 18, 2025. *Id.* The Parties have met and conferred and jointly propose the following schedule for filing of Class Plaintiffs' amended complaint<sup>1</sup> and Defendants' anticipated motion(s) to dismiss:

- Class Plaintiffs' Fourth Amended Complaint ("4AC") – April 24, 2025
- Defendants' motion(s) to dismiss the 4AC – June 30, 2025
- Class Plaintiffs' opposition brief(s) to Defendants' motion(s) – August 14, 2025
- Defendants' reply brief(s) – September 17, 2025

We thank the Court's continued attention to this matter.

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<sup>1</sup> This is the first request for extension of this deadline.

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Respectfully submitted,

*/s/ Casey E. Sadler*  
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*Counsel for Class Plaintiffs*

*/s/ Jonathan C. Uretsky*  
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*Counsel for Defendant Lottery.com, Inc.*

*/s/ Danny C. Onorato*  
Danny C. Onorato  
*Counsel for Defendant Anthony DiMatteo*

*/s/ Franklin G. Monsour, Jr.*  
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*Counsel for Defendants Matthew Clemenson  
and Ryan Dickinson*

*/s/ John A. Piskora*  
John A. Piskora  
*Counsel for Defendant Vadim Komissarov*

cc: All Counsel of Record (via ECF)